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March 30, 2012

VIA HAND DELIVERY


Linda Han, MD, MPH, Director
Bureau of Laboratory Sciences
Commonwealth of Massachusetts
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street
Jamaica Plain, MA 02130

RE: Commonwealth v. [REDACTED]
Plymouth Superior Court Criminal No. [REDACTED]

Dear Dr. Han:

Enclosed please find a subpoena seeking your appearance and the production of certain records at a scheduled hearing and trial on Monday, April 2, 2012 in the Plymouth Superior Court in Brockton. Please contact me if you have any questions.

Very Truly Yours,


Michael J. Traft

Commonwealth of Massachusetts
THE TRIAL COURT
SUPERIOR COURT DEPARTMENT

PLYMOUTH COUNTY

DOCKET [REDACTED]

COMMONWEALTH,

PLAINTIFF

v.

[REDACTED]
DEFENDANT

TRIAL SUBPOENA
And
SUBPOENA DUCES TECUM

To: Linda Han, MD, MPH, Director
Bureau of Laboratory Sciences
Massachusetts Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street
Jamaica Plain, MA 02130

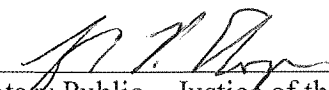
GREETING.

YOU ARE HEREBY COMMANDED, in the name of the **Commonwealth of Massachusetts** in accordance with the provisions of Rule 17 of the Massachusetts Rules of Criminal Procedure, to appear and testify on behalf of Defendant Manuel Abreu at the Plymouth Superior Court at 72 Belmont Street, Brockton, MA 02301 within and for the County of Plymouth in the Commonwealth of Massachusetts on Monday, April 2, 2012 at 9:00 a.m., and from day to day thereafter, until the action as aforesaid is heard by said Court, to give evidence of what you know relating to said action then and there to be heard and tried. In accordance with Rule 17, produce for inspection and copying all of the documents identified in Schedule A attached hereto.

HEREOF FAIL NOT, as you will answer your default under the pains and penalties in the law in that behalf made and provided.

Dated: March 30, 2012

[SEAL]


Notary Public – Justice of the Peace

My Commission Expires: 3/2013

SCHEDULE A

1. Each and every document (as defined by Mass. R. Crim. P. 14, including, without limitation, correspondence, notes and memoranda) in your possession, custody or control which evidences, substantiates, refers or relates in any way to the scientific methods of analysis employed at the William A. Hinton State Laboratory Institute for the identification of controlled substances including any and all protocols for the handling of evidence samples.
2. Each and every document (as defined by Mass. R. Crim. P. 14, including, without limitation, correspondence, notes and memoranda) in your possession, custody or control which evidences, substantiates, refers or relates in any way to the personnel file of chemist Annie Dookhan, including but not limited to recent personnel actions taken by the Department with respect to Ms. Dookhan's employment.
3. Each and every document (as defined by Mass. R. Crim. P. 14, including, without limitation, correspondence, notes and memoranda) in your possession, custody or control which evidences, substantiates, refers or relates in any way to the investigation of a breach of protocol at the William A. Hinton State Laboratory Institute discovered in June, 2011 and as disclosed in a letter from Linda Han to Norfolk District Attorney Michael W. Morrissey, dated February 21, 2012.